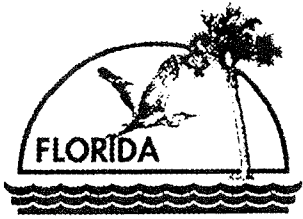


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LETTER REGARDING REGULATORY REVIEW AND COMMENTS ON REMEDIAL
INVESTIGATION AT OPERABLE UNIT 4 (OU 4) AREA C NTC ORLANDO FL
7/26/2000
FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

09.01.04.0024
00599

July 26, 2000

Mr. Wayne Hansel
Code 18B7
Southern Division
Naval Facilities Engineering Command
P.O. Box 190010
North Charleston, South Carolina 29419-0068

RE: Remedial Investigation, Redline/Strikeout version, Operable
Unit 4, Area C, Naval Training Center Orlando, Florida

Dear Mr. Hansel:

I have completed the review of the Redline/Strikeout version of the Remedial Investigation Report for Operable Unit 4, Naval Training Center Orlando, dated April 2000 (received April 5, 2000). I have the following comments that should be addressed in the Final Remedial Investigation Report:

- (1) Page 2-33, Second Paragraph. The discussion on water level elevations with respect to determining vertical gradients and flow direction is backwards. A higher water elevation in a well screened at a shallow depth than in a well screened at a deeper depth indicates a downward vertical gradient; i.e., groundwater velocity would have a component toward a deeper zone in the aquifer.
- (2) Section 5.2.4.2 Sediment Assessment. I could not match the concentrations detected in sediment discussed in the text with the concentrations shown in the chem-boxes in Figure 5-11.
- (3) Page 7-2, Table 7-1. The column listing biodegradation potentials for tetrachloroethene (PCE) and its degradation products appears to be incorrect. The column has degradation of PCE more likely occurring in an aerobic environment than in an anaerobic environment. In actuality, reductive dechlorination of PCE and TCE in anaerobic environments are important processes and are likely occurring at the site. Likewise, the biodegradation potentials column has vinyl chloride being more easily degraded in an anaerobic environment than in an aerobic environment. This is contrary to my experience. Please revise this column and also check the text to make sure that the discussion on natural attenuation is accurate.

Mr. Wayne Hansel
July 26, 2000
Remedial Investigation Report
Redline/Strikeout version
Operable Unit 4
Naval Training Center Orlando
Page 2

- (4) Sections 8.2.2.3, 8.2.2.4 and 8.2.2.5. Each section has a sentence stating that "For each sampling event not all parameters were analyzed; therefore, samples were averaged together." This statement does not make sense to me. How can analytical parameter results be averaged if they weren't analyzed for during each sampling event?
- (5) Figures 5-2 and 5-4 refer to FDEP Soil Cleanup Goals (SCGs). These should be changed to Soil Cleanup Target Levels (SCTLs).

If I can be of any further assistance with this matter, please contact me at (850)488-3693.

Sincerely,

David P. Grabka
Remedial Project Manager

cc: Barbara Nwokike, Navy SouthDiv
Nancy Rodriguez, USEPA Region 4
Richard Allen, HLA, Jacksonville
Steve McCoy, TetraTech NUS, Oak Ridge
Steve Tsangaris, CH2M Hill, Tampa
Bill Bostwick, FDEP Central District

for
TJB



JJC



ESN

